

1 WRIGHT, FINLAY & ZAK, LLP  
2 Darren T. Brenner, Esq.  
3 Nevada Bar No. 8386  
4 Lindsay D. Robbins, Esq.  
5 Nevada Bar No. 13474  
6 7785 W. Sahara Ave., Suite 200  
7 Las Vegas, NV 89117  
8 (702) 475-7964; Fax: (702) 946-1345  
9 [lrobbins@wrightlegal.net](mailto:lrobbins@wrightlegal.net)

*Attorneys for Plaintiff, U.S. Bank National Association as Trustee for Terwin Mortgage Trust  
2004-13 ALT, Asset-Backed Certificates, TMTS Series 2004-13ALT*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 U.S. BANK NATIONAL ASSOCIATION AS  
11 TRUSTEE FOR TERWIN MORTGAGE  
12 TRUST 2004-13 ALT, ASSET-BACKED  
13 CERTIFICATES, TMTS SERIES 2004-  
14 13ALT,

Plaintiff,

vs.

15 FIDELITY NATIONAL TITLE GROUP,  
16 INC.; CHICAGO TITLE INSURANCE  
17 COMPANY; TICOR TITLE OF NEVADA,  
18 INC.; DOE INDIVIDUALS I through X; and  
19 ROE CORPORATIONS XI through XX,  
inclusive,

Defendants.

Case No.: 2:20-cv-02239-GMN-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO RESPOND  
TO MOTIONS TO DISMISS [ECF Nos.  
18-20]**

**[Second Request]**

21 Plaintiff, U.S. Bank National Association as Trustee for Terwin Mortgage Trust 2004-13  
22 ALT, Asset-Backed Certificates, TMTS Series 2004-13ALT (“U.S. Bank”), Specially-  
23 Appearing Defendant Fidelity National Title Group, Inc. (“Fidelity”), and Defendants Chicago  
24 Title Insurance Company (“Chicago Title”), and Ticor Title of Nevada, Inc. (“Ticor”,  
25 collectively “Defendants”), by and through their counsel of record, hereby stipulate and agree as  
26 follows:

- 27 1. On December 9, 2020, U.S. Bank filed its Complaint in Eighth Judicial District  
28 Court, Case No. A-20-826129-C [ECF No. 1-1];

2. On December 10, 2020, Chicago Title filed its Petition for Removal to this Court [ECF No. 1];
3. On January 25, 2021, Chicago Title filed a Motion to Dismiss [ECF No. 18];
4. On January 25, 2021, Fidelity also filed a Motion to Dismiss [ECF No. 19];
5. On January 25, 2021, Ticor also filed a Motion to Dismiss [ECF No. 20];
6. On February 8, 2021, the Court entered a Stipulation and Order to Extend Time Period to Respond to the Motions to Dismiss [ECF No. 25]
7. U.S. Bank's deadline to respond to Defendants' Motions to Dismiss is currently March 10, 2021;
8. U.S. Bank's counsel is requesting an extension until April 13, 2021, to file its response to the pending Motions to Dismiss;
9. This extension is requested to allow U.S. Bank additional time to finalize and file its response to the pending Motions to Dismiss as lead handling counsel for U.S. Bank continues to recover from an unexpected medical emergency and an associate attorney for Wells Fargo recently contracted the COVID-19 virus.
10. Additionally, the Parties are currently considering whether a stay of discovery is warranted in order to litigate this case as efficiently as possible and to conserve resources.
11. Counsel for Defendants does not oppose the requested extension;

///

///

///

///

///

1 12. This is the second request for an extension which is made in good faith and not for  
2 purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 5<sup>th</sup> day of March, 2021.

DATED this 5<sup>th</sup> day of March, 2021.

5 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

6 /s/ Lindsay D. Robbins

/s/ Kevin S. Sinclair

7 Lindsay D. Robbins, Esq.

Kevin S. Sinclair, Esq.

8 Nevada Bar No. 13474

Nevada Bar No. 12277

9 7785 W. Sahara Ave., Suite 200

16501 Ventura Boulevard, Suite 400

Las Vegas, NV 89117

Encino, California 91436

10 *Attorneys for Plaintiff, U.S. Bank National*

*Attorney for Defendants, Fidelity National*

*Association as Trustee for Terwin Mortgage*

*Title Group, Inc., Fidelity National Title*

11 *Trust 2004-13 ALT, Asset-Backed*

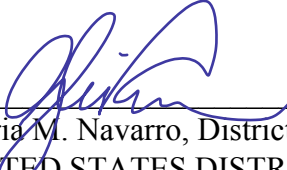
*Insurance Company, and Ticor Title of*

*Certificates, TMTS Series 2004-13ALT*

*Nevada, Inc.*

12  
13  
14  
15 **IT IS SO ORDERED.**

16 Dated this 9 day of March, 2021

17  
18  
19  
20   
21 Gloria M. Navarro, District Judge  
22 UNITED STATES DISTRICT COURT  
23  
24  
25  
26  
27  
28